

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

JUUL LABS, INC.,

Plaintiff,

v.

Civil Action No. 1:19-cv-00715

**THE UNINCORPORATED ASSOCIATIONS
IDENTIFIED IN SCHEDULE A,**

Defendants.

**PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL AND/OR REDACTED
DOCUMENTS FOR GOOD CAUSE**

Pursuant to Local Civil Rule 5, Plaintiff Juul Labs, Inc., by counsel, hereby moves for leave to file a redacted version of the following documents and/or temporarily file the following documents under seal: (1) Schedule A to the Complaint, which includes a list of eBay account names used by Defendants; (2) Exhibit 2 to the Complaint, which contains screenshots of Defendants' Internet Store listings; (3) Exhibit 3 to the Complaint, which contains screenshots of Defendants' Internet Store payment pages; and (4) Plaintiff's memorandum of law in support of its *ex parte* motion for a temporary restraining order including temporary asset restraint and expedited discovery. Sealing this portion of the file is necessary to prevent Defendants from learning of these proceedings prior to the execution of the temporary restraining order. Once the temporarily restraining order has been served on the relevant parties and the requested actions

taken, Plaintiff will move to unseal these documents. In support of its motion, Plaintiff relies on its Memorandum in Support and the Proposed Order filed herewith.

Date: June 4, 2019

Respectfully submitted,

/s/ Monica Riva Talley

Monica Riva Talley (VSB No. 41840)
Byron Pickard (VSB No. 47286)
Dennies Varughese, Pharm.D. (*pro hac pending*)
Nirav N. Desai (VSB. No. 72887)
Nicholas J. Nowak (*pro hac pending*)
Daniel S. Block (*pro hac pending*)
STERNE KESSLER GOLDSTEIN & FOX, PLLC
1100 New York Ave., N.W., Suite 600
Washington, DC 20005-3934
Telephone No.: (202) 371-2600
Facsimile No.: (202) 371-2540
mtalley@sternekessler.com
bpickard@sternekessler.com
dvarughe@sternekessler.com
ndesai@sternekessler.com
nnowak@sternekessler.com
dblock@sternekessler.com

Attorneys for Plaintiff